AO 257 (Rev. 6/78)

DEFENDANT INFORMATION RELATIVE TO A	CRIMINAL ACTION - IN U.S. DISTRICT COURT
BY: ☐ COMPLAINT ☐ INFORMATION ✓ INDICTMENT ✓ SUPERSEDING	Name of District Court, and/or-Judge/Magistrate Location NORTHERN DISTRICT OF SALIFORNIA
OFFENSE CHARGED	200
21 USC Sections 846, 841(a)(1), 841(b)(1)(C)	700 2L
Petty	DEPENDANT - U.S. TOTAL STATE OF THE STATE OF
Minor	YURI LAMBERT
Misde- meanor	TORI DAVIBERT
√ Felony	DISTRICT COURT NUMBER
PENALTY:	CR 10-376 JSW
See penalty sheet attachment	
see penalty sheet attachment	
	DEFENDANT
PROCEEDING	IS NOT IN CUSTODY
PROCEEDING Name of Complaintant Agency, or Person (&Title, if any)	Has not been arrested, pending outcome this proceeding.
DEA DEA	1) If not detained give date any prior summons was served on above charges
person is awaiting trial in another Federal or State	2) 🔲 Is a Fugitive
Court, give name of court	3) Is on Bail or Release from (show District)
this person/proceeding is transferred from another	Northern District of California
district per (circle one) FRCrP 20, 21 or 40. Show District	IS IN CUSTODY
	4) On this charge
this is a reprosecution of	5) On another conviction
charges previously dismissed which were dismissed on SHOW	6) Awaiting trial on other Fed'l State
motion of:	If answer to (6) is "Yes", show name of Institution
U.S. Att'y Defense	in answer to (b) is if es , show hame or institution
this prosecution relates to a	
pending case involving this same defendant	Has detainer Yes \ If "Yes"
prior proceedings or appearance(s) CASE NO.	been filed? No give date
before U.S. Magistrate regarding	filed
this defendant were recorded under 10-70336 BZ	DATE OF ARREST 4/23/2010 Month/Day/Year
Name and Office of Person	Or if Arresting Agency & Warrant were not
Furnishing Information on Melinda Haag	Month/Dav/Year
U.S. Att'y Other U.S. Agency	TO U.S. CUSTODY
Name of Asst. U.S. Att'y (if assigned) Nicole M. Kim	This report amends AO 257 previously submitted
PROCESS:	MATION OR COMMENTS —
	NIT Dell Assessed
☐ SUMMONS ✓ NO PROCESS* ☐ WARRA	NT Bail Amount:
If Summons, complete following:	
Or warra	efendant previously apprehended on complaint, no new summons int needed, since Magistrate has scheduled arraignment
Defendant Address:	
	Date/Time:
	Before Judge:
Comments:	

PENALTY SHEET ATTACHMENT: **YURI LAMBERT**

Count 1

2010 AUG 26 D 3. 19

AUG 26 D 3. 19

AUG 26 D 3. 19 21 U.S.C. §§ 846, 841(a)(1), 841(b)(1)(C) - Conspiracy to distribute and possess with intent to distribute 3,4 methylenedioxymethamphetamine (MDMA), a Schedule I controlled substance.

Maximum sentence of 20 years in prison, a \$1 million fine, maximum term of supervised release of life, minimum term of supervised release of 3 years, and \$100 special assessment.

Count 2

21 U.S.C. §§ 841(a)(1), 841(b)(1)(C) - Possession with intent to distribute 3,4 methylenedioxymethamphetamine (MDMA), a Schedule I controlled substance.

Maximum sentence of 20 years in prison, a \$1 million fine, maximum term of supervised release of life, minimum term of supervised release of 3 years, and \$100 special assessment.

AO 257 (Rev. 6/78) DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT Name of District Court, and/or Judge/Magistrate Location INFORMATION ✓ INDICTMENT BY: COMPLAINT NORTHERN DISTRICT OF CACIFORNIA SUPERSEDING OFFENSE CHARGED -21 USC Sections 846, 841(a)(1), 841(b)(1)(C). Petty 841(b)(1)(A)(v)Minor JAMES EDMONDS Misdemeanor DISTRICT COURT NUMBER Felony CR 10-376 JSW PENALTY: See penalty sheet attachment -- DEFENDANT --IS NOT IN CUSTODY **PROCEEDING** Has not been arrested, pending outcome this proceeding. Name of Complaintant Agency, or Person (&Title, if any) If not detained give date any prior summons was served on above charges DEA Is a Fugitive person is awaiting trial in another Federal or State Court, give name of court 3) Is on Bail or Release from (show District) Northern District of California this person/proceeding is transferred from another district per (circle one) FRCrP 20, 21 or 40. Show IS IN CUSTODY District On this charge this is a reprosecution of On another conviction charges previously dismissed Awaiting trial on other Fed'l State SHOW which were dismissed on DOCKET NO. motion of: If answer to (6) is "Yes", show name of institution U.S. Att'y Defense this prosecution relates to a pending case involving this same If "Yes" Yes Has detainer defendant **MAGISTRATE** give date been filed? No prior proceedings or appearance(s) CASE NO. filed before U.S. Magistrate regarding Month/Day/Year this defendant were recorded under DATE OF 10-70336 BZ ARREST 4/23/2010 Name and Office of Person Or... if Arresting Agency & Warrant were not Furnishing Information on Melinda Haag Month/Day/Year THIS FORM DATE TRANSFERRED | Other U.S. Agency V U.S. Att'y TO U.S. CUSTODY Name of Asst. U.S. Att'y This report amends AO 257 previously submitted (if assigned) Nicole M. Kim - ADDITIONAL INFORMATION OR COMMENTS -PROCESS: SUMMONS ✓ NO PROCESS* WARRANT Bail Amount: If Summons, complete following: *Where defendant previously apprehended on complaint, no new summons Arraignment Initial Appearance or warrant needed, since Magistrate has scheduled arraignment Defendant Address: Date/Time: Before Judge: Comments:

PENALTY SHEET ATTACHMENT: JAMES EDMONDS



Count 1

21 U.S.C. §§ 846, 841(a)(1), 841(b)(1)(C) - Conspiracy to distribute and possess with intent to distribute 3,4 methylenedioxymethamphetamine (MDMA), a Schedule I controlled substance.

Maximum sentence of 20 years in prison, a \$1 million fine, maximum term of supervised release of life, minimum term of supervised release of 3 years, and \$100 special assessment.

Count 2

21 U.S.C. §§ 841(a)(1), 841(b)(1)(C) - Possession with intent to distribute 3,4 methylenedioxymethamphetamine (MDMA), a Schedule I controlled substance.

Maximum sentence of 20 years in prison, a \$1 million fine, maximum term of supervised release of life, minimum term of supervised release of 3 years, and \$100 special assessment.

Count 5

21 U.S.C. §§ 841(a)(1), 841(b)(1)(A)(v) - Possession with intent to distribute lysergic acid diethylamide (LSD), a Schedule I controlled substance.

Mandatory minimum sentence of 10 years in prison, maximum term of life imprisonment, a \$4 million fine, maximum term of supervised release of life, minimum term of supervised release of 5 years, and \$100 special assessment.

, , , , , , , , , , , , , , , , , , ,	Name of District Court, and/or Judge (Manufacture)
SY: ☐ COMPLAINT ☐ INFORMATION ✓ INDICTMENT SUPERSEDING OFFENSE CHARGED	Name of District Court, and/or Judge/Magistrate/Location — NORTHERN DISTRICT OF CALIFORNIA
21 USC Sections 846, 841(a)(1), 841(b)(1)(C), 841(b)(1)(A)(v)	DEFENDANT - U.S.
Minor Misde-	OSHAN COOK
meanor Felony	DISTRICT COURT NUMBER
ENALTY:	CR 10-376 JSW
te penalty sheet attachment	
	IS NOT IN CUSTODY
PROCEEDING Name of Complaintant Agency, or Person (&Title, if any)	Has not been arrested, pending outcome this proceeding
DEA	If not detained give date any prior summons was served on above charges
person is awaiting trial in another Federal or State	2) Is a Fugitive
Court, give name of court	3) Is on Bail or Release from (show District)
this person/proceeding is transferred from another	Northern District of California
district per (circle one) FRCrP 20, 21 or 40. Show	IS IN CUSTODY
5.54.60	4) On this charge
this is a reprosecution of	5) On another conviction
charges previously dismissed	Awaiting trial on other Fed'l State
motion of: U.S. Att'y Defense	If answer to (6) is "Yes", show name of institution
this prosecution relates to a pending case involving this same	Handetsines Yes 1 If "Yes"
defendant MAGISTRATE prior proceedings or appearance(s) CASE NO.	Has detainer Yes If "Yes" give date filed
before U.S. Magistrate regarding	DATE OF Month/Day/Year
10-70336 BZ	ARREST 4/23/2010
Name and Office of Person	Or if Arresting Agency & Warrant were not
Furnishing Information on Melinda Haag THIS FORM	DATE TRANSFERRED Month/Day/Year
✓ U.S. Att'y ☐ Other U.S. Agency	TO U.S. CUSTODY
Name of Asst. U.S. Att'y (if assigned) Nicole M. Kim	This report amends AO 257 previously submitted
ADDITIONAL INFOR	RMATION OR COMMENTS ————————————————————————————————————
PROCESS:	
☐ SUMMONS ☑ NO PROCESS* ☐ WARRA	ANT Bail Amount:
If Summons, complete following:	defendant amaiously opposite and an expension
OC WAIT	defendant previously apprehended on complaint, no new summons ant needed, since Magistrate has scheduled arraignment
Defendant Address:	Date/Time:
	Before Judge:

PENALTY SHEET ATTACHMENT: OSHAN COOK



Count 1

21 U.S.C. §§ 846, 841(a)(1), 841(b)(1)(C) - Conspiracy to distribute and possess with intent to distribute 3,4 methylenedioxymethamphetamine (MDMA), a Schedule I controlled substance.

Maximum sentence of 20 years in prison, a \$1 million fine, maximum term of supervised release of life, minimum term of supervised release of 3 years, and \$100 special assessment.

Count 2

21 U.S.C. §§ 841(a)(1), 841(b)(1)(C) - Possession with intent to distribute 3,4 methylenedioxymethamphetamine (MDMA), a Schedule I controlled substance.

Maximum sentence of 20 years in prison, a \$1 million fine, maximum term of supervised release of life, minimum term of supervised release of 3 years, and \$100 special assessment.

Count 3

21 U.S.C. §§ 841(a)(1), 841(b)(1)(C) - Possession with intent to distribute 3,4 methylenedioxymethamphetamine (MDMA), a Schedule I controlled substance.

Maximum sentence of 20 years in prison, a \$1 million fine, maximum term of supervised release of life, minimum term of supervised release of 3 years, and \$100 special assessment.

Count 4

21 U.S.C. §§ 841(a)(1), 841(b)(1)(A)(v) - Possession with intent to distribute lysergic acid diethylamide (LSD), a Schedule I controlled substance.

Mandatory minimum sentence of 10 years in prison, maximum term of life imprisonment, a \$4 million fine, maximum term of supervised release of life, minimum term of supervised release of 5 years, and \$100 special assessment.

DEFENDANT INFORMATION RELATIVE TO A	CRIMINAL ACTION - IN U.S. DISTRICT COURT
BY: ☐ COMPLAINT ☐ INFORMATION ☑ INDICTMENT ☑ SUPERSEDING	Name of District Court, and/or Judge/Magistrate Location NORTHERN DISTRICT OF BALIFORNIA
21 USC Sections 846, 841(a)(1), 841(b)(1)(C)	DEFENDANT - U.S. 46167611 D 3.79
Minor Misde- meanor	VICTORIA VANLAANEN DISTRICT COURT NUMBER
Felony Felony	CR 10-376 JSW
PENALTY: See penalty sheet attachment	
	DEFENDANT
PROCEEDING	IS NOT IN CUSTODY
PROCEEDING Name of Complaintant Agency, or Person (&Title, if any) DEA	1) Has not been arrested, pending outcome this proceeding. If not detained give date any prior summons was served on above charges
	2) Is a Fugitive
person is awaiting trial in another Federal or State Court, give name of court	3) ✓ Is on Bail or Release from (show District)
this person/proceeding is transferred from another	Northern District of California
district per (circle one) FRCrP 20, 21 or 40. Show District	IS IN CUSTODY
	4) On this charge
this is a reprosecution of charges previously dismissed which were dismissed on motion of: U.S. Att'y Defense	5) On another conviction 6) Awaiting trial on other charges If answer to (6) is "Yes", show name of institution
this prosecution relates to a pending case involving this same defendant MAGISTRATE prior proceedings or appearance(s) CASE NO	Has detainer Yes If "Yes" give date filed
before U.S. Magistrate regarding this defendant were recorded under 10-70336 BZ	DATE OF ARREST 4/23/2010
Name and Office of Person Furnishing Information on THIS FORM Welinda Haag U.S. Att'y Other U.S. Agency	Or if Arresting Agency & Warrant were not Month/Day/Year TO U.S. CUSTODY
Name of Asst. U.S. Att'y (if assigned) Nicole M. Kim	This report amends AO 257 previously submitted
ADDITIONAL INFOR	RMATION OR COMMENTS —
PROCESS:	MILATION ON GOMINETETS
☐ SUMMONS ☑ NO PROCESS* ☐ WARRA	ANT Bail Amount:
Or warr	defendant previously apprehended on complaint, no new summons ant needed, since Magistrate has scheduled arraignment
Defendant Address:	•
	Date/Time:
0	Before Judge:
Comments:	

PENALTY SHEET ATTACHMENT: VICTORIA VANLAANEN

Count 1

2010 AUG 26 P 3: 19 21 U.S.C. §§ 846, 841(a)(1), 841(b)(1)(C) - Conspiracy to distribute and possess with intent to distribute 3,4 methylenedioxymethamphetamine (MDMA), a Schedule I controlled substance.

Maximum sentence of 20 years in prison, a \$1 million fine, maximum term of supervised release of life, minimum term of supervised release of 3 years, and \$100 special assessment.

Count 2

21 U.S.C. §§ 841(a)(1), 841(b)(1)(C) - Possession with intent to distribute 3,4 methylenedioxymethamphetamine (MDMA), a Schedule I controlled substance.

Maximum sentence of 20 years in prison, a \$1 million fine, maximum term of supervised release of life, minimum term of supervised release of 3 years, and \$100 special assessment.

United States District Court

FOR THE NORTHERN DISTRICT OF CALIFORNIA

VENUE: SAN FRANCISCO

UNITED STATES OF AMERICA,

V.

YURI LAMBERT, et al.

DEFENDANT(S).

SUPERSEDING INDICTMENT

Filed in open court this May of Clerk

1	MELINDA HAAG (CABN 132612) United States Attorney	2010 111
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3		THE WEST PLANE
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5		
6		
7		
8	UNITED STA	TES DISTRICT COURT
9	NORTHERN DI	STRICT OF CALIFORNIA
10	SAN FRA	NCISCO DIVISION
11		
12	UNITED STATES OF AMERICA) No. CR 10-0376 JSW
13		 VIOLATIONS: 21 U.S.C. § 846 – Conspiracy to Possess with Intent to
14	V.	 Distribute and to Distribute MDMA; 21 U.S.C. §§ 841(a)(1) & (b)(1)(C) – Possession with Intent to Distribute MDMA;
15	YURI LAMBERT, JAMES EDMONDS,) 21 U.S.C. §§ 841(a)(1) & (b)(1)(A)(v) –
16 17	OSHAN COOK, and VICTORIA VANLAANEN,	 Possession with Intent to Distribute LSD; and 18 U.S.C. § 2 – Aiding and Abetting; Criminal Forfeiture Allegation
18	Defendants.) SAN FRANCISCO VENUE
19		_}
20	<u>SUPERSE</u> I	DING INDICTMENT
21	The Grand Jury charges:	
22	COUNT ONE:	
23	Beginning at a time unknown to the	Grand Jury, but no later than in or around March
24	2010, and continuing thereafter up through	and including April 22, 2010, both dates being
25	approximate and inclusive, in the Northern	District of California and elsewhere, the defendants,
26		RI LAMBERT, ES EDMONDS,
27	OSH	AN COOK, and IA VANLAANEN,
28	VICTOR	IA TAITLAAITLIT,

INDICTMENT

1	and others known and unknown, knowingly and intentionally conspired to possess with intent to		
2	distribute and to distribute 3,4-Methylenedioxymethamphetamine (MDMA), a Schedule I		
3	controlled substance, in violation of Title 21, United States Code, Sections 846, 841(a)(1), and		
4	841(b)(1)(C).		
5	COUNT TWO:		
6	On or about April 22, 2010, in the Northern District of California, the defendants,		
7	YURI LAMBERT,		
8	JAMES EDMONDS, OSHAN COOK, and		
9	VICTORIA VANLAANEN,		
10	did knowingly and intentionally possess with intent to distribute		
11	3,4-Methylenedioxymethamphetamine (MDMA), a Schedule I controlled substance, in violation		
12	of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C), and Title 18, United States		
13	Code, Section 2.		
14	COUNT THREE:		
15	On or about April 22, 2010, in the Northern District of California, the defendant,		
16	OSHAN COOK,		
17	did knowingly and intentionally possess with intent to distribute 3,4		
18	methylenedioxymethamphetamine (MDMA), a Schedule I controlled substance, in violation of		
19	Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C), and Title 18, United States		
20	Code, Section 2.		
21	COUNT FOUR:		
22	On or about April 22, 2010, in the Northern District of California, the defendant,		
23	OSHAN COOK,		
24	did knowingly and intentionally possess with intent to distribute a Schedule I controlled		
25	substance, to wit: ten (10) grams or more of a mixture or substance containing a detectable		
26	amount of lysergic acid diethylamide, or LSD, in violation of Title 21, United States Code,		
27	Sections 841(a)(1) and 841(b)(1)(A)(v), and Title 18, United States Code, Section 2.		
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1	COUNT FIVE:
2	On or about April 22, 2010, in the Northern District of California, the defendant,
3	JAMES EDMONDS,
4	did knowingly and intentionally possess with intent to distribute a Schedule I controlled
5	substance, to wit: ten (10) grams or more of a mixture or substance containing a detectable
6	amount of lysergic acid diethylamide, or LSD, in violation of Title 21, United States Code,
7	Sections 841(a)(1) and 841(b)(1)(A)(v), and Title 18, United States Code, Section 2.
8	FORFEITURE ALLEGATION:
9	1. The factual allegations contained in Counts One, Two, Three and Four of this
10	Superseding Indictment are re-alleged and fully incorporated herein for the purpose of alleging
11	forfeiture pursuant to the provisions of 21 U.S.C.§§ 853(a)(1) and (a)(2).
12	2. Upon a conviction of any of the offenses alleged in Counts One, Two, Three and
13	Four of this Superseding Indictment, the defendants,
14 15 16	YURI LAMBERT, JAMES EDMONDS, OSHAN COOK, and VICTORIA VANLAANEN, shall forfeit to the United States all right, title, and interest in property constituting and derived
17	from any proceeds defendants obtained, directly or indirectly, as a result of said violations, and
18	any property used, or intended to be used, in any manner or part, to commit or to facilitate the
19	commission of the said violations.
20	3. If, as a result of any act or omission of the defendants, any of said property
21	a. cannot be located upon the exercise of due diligence;
22	b. has been transferred or sold to or deposited with, a third person;
23	c. has been placed beyond the jurisdiction of the Court;
24	d. has been substantially diminished in value; or
25	e. has been commingled with other property which cannot be divided without
26	difficulty;
27	any and all interest defendants have in any other property (not to exceed the value of the above

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forfeitable property) shall be vested in the United States and forfeited to the United States.

Case3:10-cr-00376-JSW Document78 Filed08/26/10 Page13 of 13

All in violation of Title 21, United States Code, Section 853(a)(1), (a)(2), (p) and Rule 32.2 of the Federal Rules of Criminal Procedure. DATED: 8/26/10 A TRUE BILL. MELINDA HAAG United States Attorney nief, Criminal Division (Approved as to form: